

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

March 9, 2021

**BY ECF**

The Honorable Judge Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. Desirae Schneider  
20 Cr. 325 (SHS)**

Dear Judge Stein,

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to drive to Astoria, Queens on Saturday, March 13, 2021 and stay through Sunday, March 14, 2021 to continue to help a friend pack up her apartment in preparation for a move. Pretrial services and the Government do not object to this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On June 22, 2020, Magistrate Judge Gorenstein granted Ms. Schneider's request for a temporary bail modification to allow her to travel to Milford, Connecticut from Saturday, June 27 through Sunday, June 28 to attend a small outdoor wedding. Ms. Schneider attended the wedding without incident. On July 29, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to travel to Illinois to visit her family for one week in August 2020. Ms. Schneider planned this trip in consultation with her pretrial services officer. On August 6, 2020, the Court granted Ms. Schneider's request for a temporary bail modification

to enable to her drive to Milford, Connecticut for a small birthday gathering with friends on August 9, 2020. On September 18, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Milford, Connecticut to visit friends on September 20, 2020.

On October 16, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to drive to Astoria, Queens to visit friends on that day. On November 4 and December 2, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to drive to Astoria, Queens to visit friends and stay overnight. On December 16, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Astoria and Long Island City, Queens on Saturday, December 19, 2020 for a small wedding and to drive to Illinois to visit her family from Monday, December 21 through Sunday, December 27, 2020. On January 14, 2021, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Astoria, Queens on Thursday, January 14, 2021 and stay overnight until Friday, January 15, 2021 to attend a small memorial in honor of a friend who recently passed away. On January 26, 2021, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Astoria, Queens on Friday, January 29, 2021 and stay through Sunday, January 31, 2021 to help a friend move. On February 16, 2021, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Astoria, Queens on Saturday, February 20, 2021 and stay through Sunday, February 21, 2021 to help a friend move. On March 2, 2021, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Astoria, Queens on Saturday, March 6, 2021 and stay through Sunday, March 7, 2021 to continue to help her friend pack up her apartment in preparation for a move. Since the start of this case, Ms. Schneider has remained in consistent compliance with the conditions of her release.

Ms. Schneider now respectfully requests a temporary bail modification to enable her to drive to Astoria, Queens on Saturday, March 13, 2021 and stay through Sunday, March 14, 2021 to continue to help her friend pack up her apartment. The complainant in this case will not be there. The Government and pretrial services do not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**



---

**HONORABLE SIDNEY H. STEIN**  
United States District Judge  
**Dated: New York, New York**  
**March 9, 2021**

cc: Rebecca Dell, Assistant U.S. Attorney (by ECF)  
Jonathan Lettieri, Pre-Trial Services Officer (by email)